

SHER TREMONTE LLP

September 9, 2021

VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, 18 Crim. 204 (NGG)

Dear Judge Garaufis:

I write to respectfully request a temporary modification of Kathy Russell's bail conditions to allow her to travel with her son to the Chapel Hill/Durham area of North Carolina. Ms. Russell would leave from Georgia on Friday, September 10 and return to Georgia on Sunday, September 12.

The government, by AUSA Tanya Hajjar, and Pretrial Services do not object to Ms. Russell's request.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Justine A. Harris

Justine A. Harris

cc: All Counsel (via ECF)